

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:

LINDSAY LAMPASONA, LLC,
Debtor.

Case No. 11-19747 (JNF)

Chapter 7

ASSENTED-TO MOTION TO EXTEND OBJECTION DEADLINE
(Emergency Relief Requested)

The Bank of Canton (the “**Bank**”), by and through its undersigned attorneys, and with the assent of Rykor Concrete & Civil, Inc. (“**Rykor**”), hereby moves this Court to extend the objection deadline to *Rykor’s Request for Payment of Chapter 11 Administrative Expense* (the “**Application**”) [Doc. # 208]. In support of this motion, the Bank makes the following statements:

1. On May 18, 2012, Rykor filed the Application and, by MLBR 9013-1, the objection deadline for the Application would be June 1, 2012.
2. On May 18, 2012, the Debtor filed the *Motion for Entry of Order approving Stipulation By and Between the Debtor and the Bank of Canton* (the “**Motion**”) [Doc. # 210].
3. On May 21, 2012, the Debtor’s case was converted to a case under Chapter 7 and Lynne F. Riley (the “**Trustee**”) was appointed as Trustee of the Debtor’s bankruptcy estate.
4. On May 30, 2012, the Trustee filed a motion seeking to extend to June 15, 2012, the deadlines for responding to the Application and the Motion. That motion was granted on May 30, 2012. While the Bank believes that the motion extended the deadline for all

parties to object to the Application and Motion, it files this motion in an abundance of caution.

5. The Bank further believes that the resolution of the Motion will likely have an impact on the outcome of the Application. As a result, the Bank has requested – and received – Rykor’s assent to a continuance until June 15, 2012 of the deadline to respond to the Application.

WHEREFORE, for the reasons set forth herein, the Bank respectfully requests that the Court extend to June 15, 2012 the deadline for it to object or otherwise respond to the Application and for such other and further relief as the Court deems appropriate.

Dated: June 1, 2012

Respectfully submitted,

THE BANK OF CANTON,

By its attorneys,

/s/ Alexander G. Rheume

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Assented-to by:

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